

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

HONEYWELL INTERNATIONAL INC. and)	
HONEYWELL INTELLECTUAL PROPERTIES INC.,)	
)	
Plaintiffs,)	C.A. No. 04-1338-KAJ
v.)	
)	
APPLE COMPUTER, INC., <i>et al.</i>)	
Defendants.)	
)	

DECLARATION

I, Toyokazu Nagano, declare as follows:

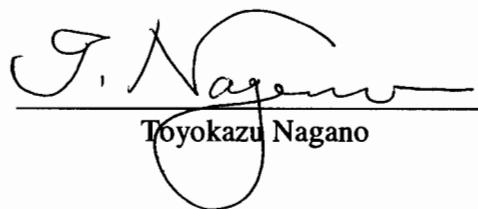
1. I am over the age of 21 and have personal knowledge of the facts stated in this declaration. If called as a witness, I could testify to those facts.
2. I am employed by Hitachi Displays, Ltd. ("HDL").
3. My title is Senior Manager, Global Business Support Center, Hitachi Displays, Ltd. My primary responsibility is Technology and Patent Licensing.
4. On October 1, 2002, the "Display Group" of Hitachi Ltd. (the group responsible for Hitachi Ltd.'s LCD products business prior to that date) was transferred to HDL. All, or substantially all, documents relating to the Display Group's LCD products business through October 1, 2002 were also transferred to HDL. To the extent any LCD-related documents remain at Hitachi Ltd., HDL would have access to them.
5. In connection with the transfer of Hitachi Ltd.'s LCD products business to HDL, HDL assumed liability for all of Hitachi Ltd.'s past acts of alleged infringement respecting the LCD products business.

6. Hitachi Display Devices, Ltd. ("HDD") is a wholly-owned subsidiary of HDL.

HDD manufactures backlight units that are incorporated into LCD products. Some portion of the backlight units manufactured by HDD are sold to third-party, non-Hitachi entities. HDD does not manufacture and/or distribute finished LCD products, and has not done so in the past. HDL has access to the technical and sales information and personnel of HDD, including information related to HDD's non-Hitachi customers.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 27, 2006



Toyokazu Nagano